

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

LORI FITZGERALD, *et al.*, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

JOSEPH WILDCAT SR., *et al.*,

Defendants.

Case No. 3:20-cv-00044 (NKM)

MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Lori Fitzgerald, Aaron Fitzgerald, Kevin Williams, Jade Singleton, and Angela Maville, on behalf of themselves and all individuals similarly situated (“Plaintiffs”),¹ submit this Motion for Final Approval of Class Action Settlement. For the reasons explained in the Memorandum in Support filed contemporaneously herewith, Plaintiffs respectfully request that the Court grant this Motion for Final Approval of the Class Action Settlement, as well as their request for reasonable service awards and attorneys’ fees. A proposed order is attached as Exhibit 1, and Plaintiffs will submit a final word version of the order based on the Court’s rulings at the final approval hearing scheduled for December 13, 2024.

Respectfully submitted,
PLAINTIFFS

/s/ Kristi C. Kelly
Kristi Cahoon Kelly, VSB #72791

¹ Three other borrowers, Daniel Goodman, Gustinna De Silva, and John Tucker, have been involved in this case and settlement. Because of the motions to dismiss and appeal, these borrowers were not added as named plaintiffs, but would have been if the Settlement was not agreed to. Because of their involvement, they have been included as signatories to the Settlement and are included when referring to “Plaintiffs.” These three borrowers were appointed as class representatives in the Court’s Preliminary Approval Order. *See* Dkt. 187 at ¶ 6.

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